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STATE OF INDIANA

FRANK O'BANNON, Governor

INDIANA DEPARTMENT OF LABOR

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Deputy Commissioner's Letter

Dear Indiana Employers and Employees,

It is my pleasure to introduce you to Indiana's Voluntary Protection Program (VPP), Indiana's recognition award for workplaces with exceptional safety and health programs. VPP is designed for worksites with comprehensive, successful safety and health programs. All industries are welcome, and any company with injury incidence rates and lost workday case rates below the national average for their business is encouraged to apply. By working together, including industry, labor, and government, we can achieve our joint goal of having safe workplaces.

Your participation in VPP will entitle you to the designation of one of the State of Indiana's safest workplaces, and will allow your business to be recognized for the hard work it takes to maintain a safe work environment. Compliance with IOSHA standards alone cannot completely accomplish the goals of the Indiana Occupational Safety and Health Act. VPP is intended as a supplement, and a means of encouraging voluntary improvements and expansion of worker protection systems.

VPP participants meet all relevant IOSHA standards and have on-going safety and health programs. The Bureau of Safety Education and Training (BuSET) will verify your qualifications, exempt your company from IOSHA's programmed inspection lists for the duration of your participation, provide necessary technical support, and evaluate your programs. By qualifying for VPP, you will demonstrate to everyone in your company and your community that you have successfully implemented a high quality safety and health program, and that you are a leader in the safety and health field.

Please review the enclosed application information. If you have questions, please contact me, the VPP Manager, or Bill Miller, the VPP Team Leader. We encourage you to contact us prior to application submission, and we look forward to working with you. With your help, we can make Indiana one of the safest places to work in the country.

Sincerely,

Diane K. Mack
Deputy Commissioner
Indiana Department of Labor
Bureau of Safety Education and Training

An Overview

What is VPP?

The Indiana VPP Program is designed to recognize and promote safety and health management programs. In VPP, management, labor, and IDOL establish a cooperative relationship at a workplace that has implemented a strong program:

Management agrees to operate an effective program that meets an established set of criteria.

- Employees agree to participate in the program and work with management to ensure a safe and healthful workplace.
- IDOL verifies that the program meets VPP criteria, publicly recognizes the site's exemplary program, and removes the site from programmed IDOL compliance inspections.

Note: IDOL will continue to investigate valid, formal employee safety and health complaints, significant chemical spills and leaks, and all fatalities and catastrophes.

- IDOL also reassesses periodically to confirm that the site continues to meet VPP criteria.

The VPP concept recognizes that IOSHA enforcement alone can never fully achieve the objective of the Indiana Occupational Safety and Health Act. Good safety management programs that go beyond IOSHA standards can protect workers more effectively than simple compliance. VPP participants are a select group of facilities that have designed and implemented outstanding safety and health programs.

What are the benefits?

The following benefits have been cited by VPP participants:

- Improved employee motivation to work safely, leading to better quality and productivity.
- Reduced workers' compensation costs.
- Recognition in the community.
- Improvement of programs that are already good, through the internal and external review that is part of the VPP application process.
- VPP participant sites generally experience from 60 to 80 percent fewer lost workday injuries than would be expected of an average site of the same size in the same industry.

Won't this just make me do a lot of paperwork without making my program better?

The VPP application process is designed to be rigorous, to assure that only the best programs qualify. But VPP reviewers don't look for a single correct way to meet VPP

requirements. They want to see a system that works for you. Some successful programs involve considerable written documentation, while others do not.

There is some paperwork required in the application process, but applicants may use as much existing material as possible. The Indiana VPP Program manager can help you with questions about what might be required.

Will my program qualify?

A self-assessment checklist is included in the VPP information kit. Use the checklist to see if your program meets VPP criteria.

How do I join?

You must submit a written application to IDOL. The application is included in the VPP information kit. After your written application has been reviewed by IDOL, an onsite review will be scheduled.

Where can I get more information?

The Indiana VPP program manager can help you with any questions you have about self-assessment, the application, or other VPP matters.

The Indiana VPP Program can also refer you to other VPP participants in your area so you can contact them about their experience.

Checklist

Self-Assessment Checklist

The items listed below will help you determine your eligibility for the Indiana VPP . Check each item that you currently have or would be willing to implement. When you have completed the checklist, check the scorebox on the back to see how you measure up.

When you are ready to submit your application, the Indiana VPP manager's office will be glad to help.

Management Commitment

- A managerial commitment to worker safety and health protection.
- Top management's personal involvement.
- Safety and health concerns integrated into management's overall planning cycle.
- A safety and health program managed in the same ways as your productivity and quality are implemented.
- Necessary resources for worker protection.
- A results-oriented safety and health policy.
- Clearly assigned safety responsibilities with documentation of accountability from top management to line supervisors.
- Equal protection for contract workers as well as for your own employees.

Safety and Health Program

- A written safety and health program appropriate to the size of your site and your industry. The program should address all the elements in the checklist.

Rates

- For consideration for the Indiana VPP STAR program the three-year average injury incidence rate and lost workday case rate must be at or below the national average for your type of business as listed by the Bureau of Labor Statistics (BLS)
- Construction only: Combined injury records for all workers at your site, whether or not they are your employees.
- Annual injury rate records and employment statistics.

Worksite analysis

- A method to evaluate existing or potential hazards in your workplace such as comprehensive surveys.
- A pre-use analysis procedure for new processes, materials, or equipment to determine potential hazards.
- Environmental evaluations and appropriate monitoring of toxic substances and noise.
- Monthly self-inspections (weekly for construction) with written documentation and correction tracking.
- Routine hazard analysis procedures which result in improved work practices or training for employees.
- A reporting system whereby employees pass on their observations or concerns to management without fear of reprisal.
- Accident investigations with written documentation.

Hazard prevention and control

- Access to certified safety and health professionals.
- Engineering and administrative controls adequate for the hazards at the worksite.
- Written safety rules and practices well known to all employees.
- A consistent disciplinary system for all employees who disregard the rules.
- Written rules for use and maintenance of personal protective equipment.
- Written plans to cover emergency situations.
- A hazard correction tracking procedures.
- Onsite or offsite medical and emergency services.
- First-aid trained personnel on staff during all shifts.

Safety and health training

- Manager, supervisory, and employee training, with emphasis on safe work practices.
- Training in the use and maintenance of personal protective equipment.
- Emergency preparedness drills.

Employee participation

- Employee involvement in activities with major impact on the safety and health program.

Construction only: A committee with equal employee and management representation, with regularly scheduled meetings and inspections.

Program evaluation

- Annual program evaluations, with written reports and recommendations for change.

Review

- Records of employee reports, self-inspections and evaluations, accident investigations, and industrial hygiene monitoring and sampling available for IDOL's review.

Concurrence

- Formal, signed statements from any collective bargaining agents indicating their support of your application to the Indiana VPP.

Application

Your Indiana VPP Program application must address each item listed below. Use of the numbering system below helps speed review of your application. Where existing policies, guidelines, forms, etc., describe your programs, you are encouraged to enclose them and add the appropriate number used in the numbering system for this application.

I. General information

1. Company name:
2. Site address:
3. Company address if different than site:
4. Site C.E.O.: (name and title)
5. Indiana VPP site representative: (name and title)
6. Representative address if different than site:
7. Corporate name if different than company name:
8. Corporate Indiana VPP representatives if applicable: (name and title)
9. Company site phone number:
10. Corporate phone number:
11. Collective bargaining representatives: (agent(s), address(es), phone number(s))
12. Number of employees at site:
13. Type of work performed and products produced at site
14. Industry SIC code (3-4 digit number)
15. Total Recordable Case Rate (TCIR) for nonfatal injuries and illnesses for each of the last three complete calendar years and average of those years.

N = number of cases

EH = employee hours worked for calendar year

(OSHA 200 Log Columns 2 + 6 + 9 + 13 = N)

YR_____ N_____ / EH_____ x 200,000 = _____

YR_____ N_____ / EH_____ x 200,000 = _____

YR_____ N_____ / EH_____ x 200,000 = _____

Total TN_____ / TEH_____ x 200,000 = _____

Total_____ = TCIR Three-year average

16. Days away from work, restricted work activity, and/or job transfer (DART) for nonfatal injuries and illnesses for each of the last three complete calendar years and the average of those years.

17. (OSHA 200 Log Columns 2 + 9)

YR_____ N_____ / EH_____ x 200,000 = _____

18. YR_____ N_____ / EH_____ x 200,000 = _____

19. YR_____ N_____ / EH_____ x 200,000 = _____

20.

21.

22. Total TN_____ / TEH_____ x 200,000 = _____

23.

24. Total _____ = DART Three-year average

II. Management commitment and planning

1. Commitment: (a) Attach a copy of your site's established safety and health program.

(b) Describe your current goals for the safety and health program with objectives for meeting those goals.
2. Organization: (a) Provide a description of how the safety and health function fits into the overall management organization. (b) Include a description of personnel and other resources devoted to the safety and health program.

(c) Include information about any certified professionals used and access to industrial hygiene and medical services.
3. Responsibility: Describe how your company assigns line and staff safety and health responsibility.
4. Accountability: Describe the accountability system you use for line managers and supervisors. Appropriate examples may include job performance evaluations, etc. Explain how the system is documented.
5. Contract workers: Describe the method you use to assure safe and healthful working conditions for all employees even where more than one employer has employees at the same site. This includes general industry sites if contract employees intermingle with regular employees.

Does this method include consideration of contractor safety and health programs and injury performance as well as the ability to remove a contractor and/or his employees from the site for safety and health violations:

6. Employees' rights: Describe the method(s) used to ensure that all employees, including new hires as they arrive, will be notified about participation in the Indiana VPP, their rights to register a complaint with IDOL, their rights to obtain self- inspection and accident investigation results upon request. (Various methods may include one or a combination of the following: bulletin boards, tool box or work group meetings, and new employee orientation.)
7. Site plan: Please attach a site map or general plant layout.

III. Worksite analysis

1. Pre-use analysis: Explain how new equipment, materials, and processes are analyzed for potential hazards prior to use.

2. Comprehensive surveys: Indicate how you spot potential safety and health hazards at the site. Examples are industrial hygiene surveys, comprehensive safety reviews and/or project safety reviews at the time of design.
3. Self-inspections: Describe your worksite safety and health inspection procedures. Include information about inspection schedules and industrial hygiene sampling and monitoring; Indicate who performs inspections and how any necessary corrections are tracked. (You may attach sample forms and internal time frames for correction.) Where applicable to health hazards, summarize the testing and analysis procedures used and qualifications of personnel who conduct them.
4. Job hazard analysis: Relate how you review jobs, processes, and/or interaction of activities to determine safe work procedures. (Not to be confused with self-inspections.) Include procedures or guidance techniques used in conducting job hazard analysis. In construction, relate phase-planning, and describe how results are used in training employees to do their jobs safely. Also, how are results used in planning implementation of your hazard correction and control program?
5. Employee notification of hazards: Describe how employees notify management when they see conditions and/or practices that may be hazardous to safety or health. What mechanism is used for responding to employees? How are corrections tracked? (You may attach forms or procedures.)
6. Accident investigations: Describe or attach any forms and procedures for conducting accident investigations. What training and/or guidance is given to investigators? Are all accidents, including first-aid cases, investigated? What about near-miss incidents?
7. Medical program: Describe the medical/first-aid program. Include onsite and offsite medical service or physician availability. Include a list or number of people trained in first-aid, CPR, paramedical training, and bloodborne pathogens, indicate which training they have received.

IV. Hazard prevention and control

1. Professional expertise: Provide details concerning your use of the services of certified professionals. What industrial hygiene services and broad-based safety expertise are available to you?
2. Safety and health rules: List your company's rules, and describe the disciplinary system you use for enforcing them.
3. Personal protective equipment: Describe your company's rules regarding personal protective equipment requirements. If respirators are used, attach a copy of the written respirator program.

4. Emergency preparedness: Describe your company's emergency planning and preparedness program. Include information on emergency or evacuation drills.
5. Preventive maintenance: Provide a summary and description of your procedures for preventive maintenance of your equipment.

V. Safety and health training

1. Safety and health training: Describe formal and informal safety and health training programs for your employees. Include supervisors' training schedules and information on: hazard communication, personal protective equipment and handling of emergency situations. (Sample attendance lists and tracking methods, if any, may also be attached if desired.)

VI. Employee involvement

1. Employee involvement: Describe the ways employees are involved in the safety and health program, providing specific information about decision processes that employees impact such as hazard assessment, hazard analysis, safety and health training or evaluation of the safety and health program.
2. If you have a safety and health committee, complete the following information where applicable:
 1. Date of committee inception
 2. Method of selecting employee members
 3. Name, job and length of service of each member
 4. Average length of service of employee members
 1. Description of committee meeting requirements
 - Frequency
 - Quorum Rules
 - Minutes - (you may attach samples)
 2. Description of committee role
 - Frequency and scope of committee inspections
 - Procedures for inspecting entire worksite
 - Role in accident investigation
 - Role in employee hazard notification
 - Other
 3. List safety and health information accessible to and used by the committee

VII. Program evaluation

1. Safety and health program self-evaluation: Provide a copy of last year's comprehensive review and evaluation of your entire safety and health program. Assessments of the effectiveness of the areas listed in these application guidelines should be included.
2. Describe your involvement within your community to assist other companies in providing knowledge and resources pertaining to both safety and health.
3. Include any other information you may consider crucial to the application.

VIII. Statement of commitment

1. Union statement: If your site is unionized, the authorized collective bargaining agent(s) must sign a statement to the effect that they either support the VPP application, or that they have no objection to the site's participation in VPP. The statement must be on file before IDOL comes on site.
2. Assurance statement: Please read the following statement carefully and either place on your stationery and sign, or attach a letter which provides the same assurance in your words. (A statement of this type regarding management commitment to safety and health is required for the application.)

We are committed to doing our best to provide outstanding safety and health protection to our employees through management systems and employee involvement. We are also committed to the achievement and maintenance of the Indiana VPP requirements and to the goals and objectives of the VPP.

We agree to provide the information listed below for IDOL review onsite. We agree to retain these records until IDOL communicates its decision regarding initial VPP participation.

We will likewise retain comparable records for the period of VPP participation to be covered until IDOL communicates its decision regarding continued approval.

- Written safety and health program
- Management statement of commitment to safety and health
- The OSHA 200 log for the site and for all applicable contractor employees on the site, with appropriate back-up documentation
- Safety and health manual(s)
- Safety rules, emergency procedures, and examples of safe work procedures
- The system for enforcing safety rules
- Reports from employees of safety and health problems and documentation of the response
- Self-inspection procedures, reports, and correction tracking

- Accidents/incident investigation reports
- Safety and health committee minutes
- Employee orientation and safety training programs and attendance records
- Industrial hygiene monitoring records
- Annual safety and health program evaluations and site and/or corporate audits, including the documented follow-up activities, for at least the last three years
- Preventive maintenance program
- Line supervision accountability documentation
- Contractor safety and health program(s)
- Other records that provide relevant documentation of qualifications

In agreeing to make this information available to IDOL, we understand that materials needed to document the safety and health that may involve invasion of privacy or a trade secret will not be included in the application. Instead, such materials will be described in the application and provided for viewing only at the site during an application assistance visit and/or during the Pre-Approval Onsite Review.

We also agree to correct all hazards identified through self-inspection, employee reports or accident investigations in a timely manner. We will provide the results of self- inspections and accident investigations to our employees upon request. Employees with safety- related duties will be protected from discriminatory actions (including unofficial harassment) resulting from these duties.

We will provide IDOL, each year by February 15, our annual injury incidence rate and lost workday case rates, hours worked, and estimated average employment for the past calendar year.

(For construction sites only - Injuries of all employees at the site, no matter who the employer is, will be recorded together. Rates will be calculated based on information for the site as a whole as long as we participate in Indiana VPP.)

It is important that we continue to be a leader within our community and to assist other companies at our discretion with knowledge and resources pertaining to both safety and health.

We understand that we may withdraw our participation at any time or for any reason should we so desire.

CEO of the applicant worksite